

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

NINO MATINENKO, on behalf of herself and
others similarly situated,

Plaintiff,

Case No. : 1:22-cv-00518-JLR-RWL

- against -

**AFFIDAVIT OF
BONIFACIO RAMOS**

212 STEAKHOUSE, INC., and NIKOLAY
VOLPER,

Defendants.

-----X

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

I, **BONIFACIO RAMOS**, being duly sworn, deposes, and swears to affirm the truth
under penalties of perjury:

1. I, **BONIFACIO RAMOS**, am not a party of this action.
2. I currently reside at 1910 Grand Concourse, Bronx, New York 10457.
3. In or about March 2022, I began working for Defendant, 212 Steakhouse, Inc., as a runner.
4. I still currently work for Defendant, 212 Steakhouse, Inc.
5. Throughout my tenure while working for Defendant(s), I have had no negative interactions with Defendant(s).
6. In or about May 2022, I received a text message from a phone number of “718-501-4730”, which appears to be soliciting information and/or recruiting employees regarding this lawsuit.

7. This text message advised me to call "212-688-5640". See Exhibit A.
8. Upon information and research, it appears that the text message that came from "718-501-4730" and the phone number listed in the text message "212-688-5640" are both associated with Joseph & Kirschenbaum LLC.
9. It is my position that I would not like to take part in this lawsuit against Defendants.

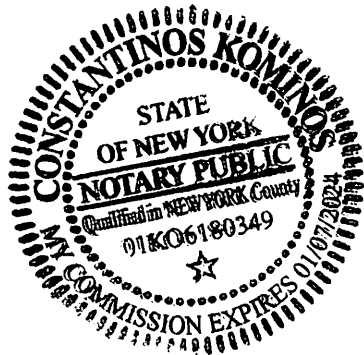
DATED: New York, New York
March 10, 2023



BONIFACIO RAMOS

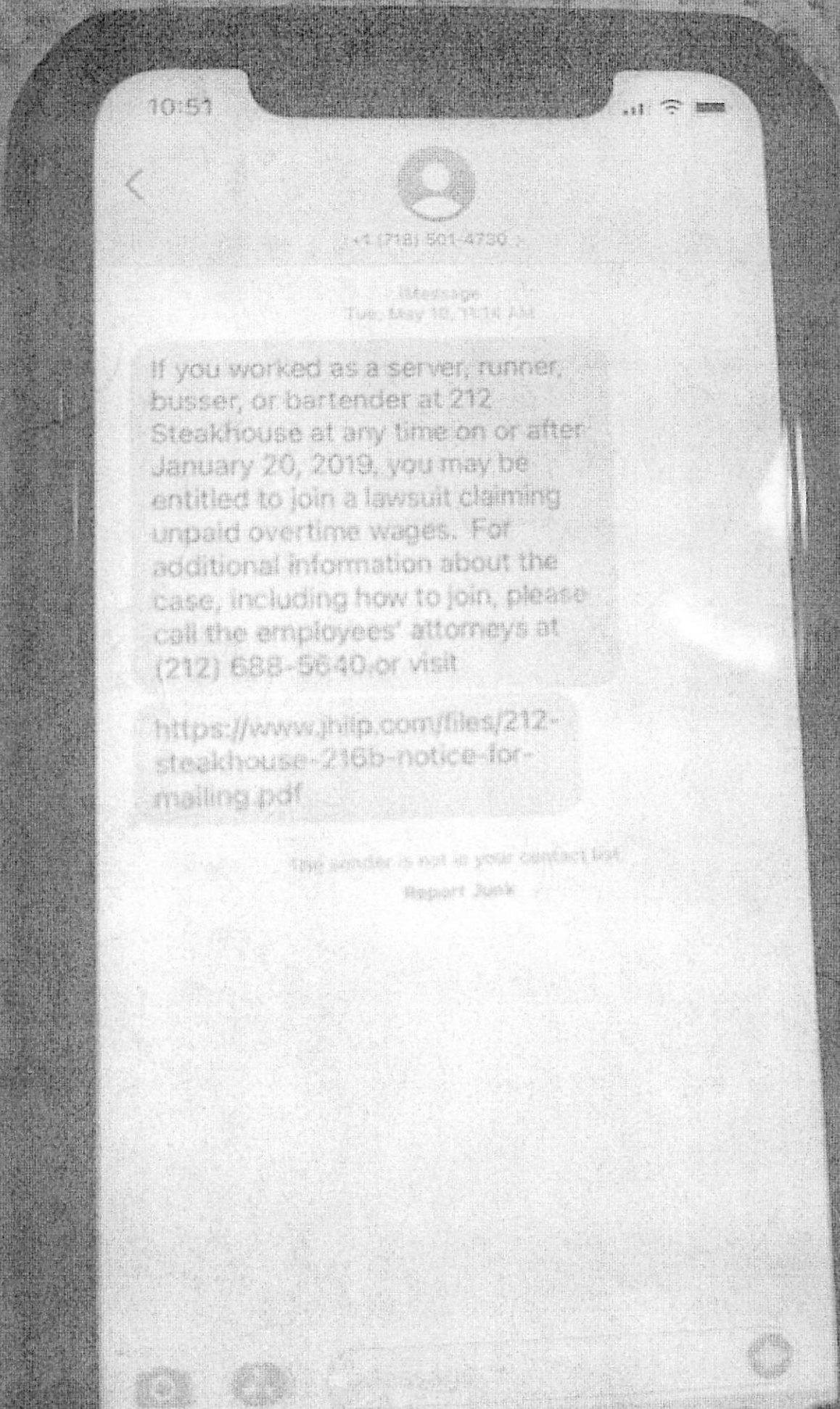
STATE OF NEW YORK, COUNTY OF NEW YORK, ss.

On the 10 day of March, 2023, before me, the undersigned notary public, personally appeared BONIFACIO RAMOS, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.





Notary Public



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

NINO MATINENKO, on behalf of herself and
others similarly situated,

Plaintiff,

Case No. : 1:22-cv-00518-JLR-RWL

- against -

**AFFIDAVIT OF
ALEXANDER RYNKOVSKY**

212 STEAKHOUSE, INC., and NIKOLAY
VOLPER,

Defendants.

-----X

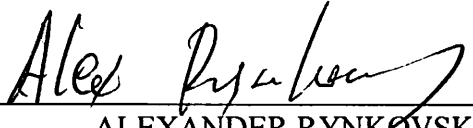
STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

I, **ALEXANDER RYNKOVSKY**, being duly sworn, deposes, and swears to affirm the
truth under penalties of perjury:

1. I, ALEXANDER RYNKOVSKY, am not a party to this action.
2. I currently reside at 65 Oriental Blvd., Apt. 8B, Brooklyn, New York 11235.
3. In or about October of 2015, I began working for Defendant, 212 Steakhouse, Inc., as server.
4. I am still currently employed by Defendant, 212 Steakhouse, Inc., as a server.
5. Throughout my tenure while working for Defendant(s), I have had no negative interactions with Defendant(s).
6. In or about May 2022, I received a text message from a phone number of “718-501-4730”, which appears to be soliciting information and/or recruiting employees regarding this lawsuit.

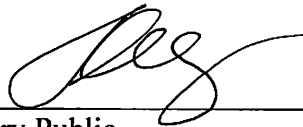
7. This text message advised me to call "212-688-5640". See Exhibit A.
8. Upon information and research, it appears that the text message that came from "718-501-4730" and the phone number listed in the text message "212-688-5640" are both associated with Joseph & Kirschenbaum LLC.
9. It is my position that I would not like to take part in this lawsuit against Defendants.

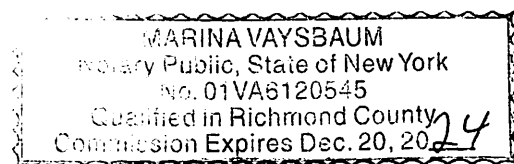
DATED: New York, New York
March 6, 2023


ALEXANDER RYNKOVSKY

STATE OF NEW YORK, COUNTY OF NEW YORK, ss.

On the 6th day of March 2023, before me, the undersigned notary public, personally appeared ALEXANDER RYNKOVSKY, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.


Notary Public



10:51



+1 (718) 501-4730

Message

Tue, May 10, 11:14 AM

If you worked as a server, runner, busser, or bartender at 212 Steakhouse at any time on or after January 20, 2019, you may be entitled to join a lawsuit claiming unpaid overtime wages. For additional information about the case, including how to join, please call the employees' attorneys at (212) 688-5640 or visit

<https://www.inilp.com/files/212-steakhouse-216b-notice-for-mailing.pdf>

This sender is not in your contact list.

Report Junk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NINO MATINENKO, on behalf of herself and
others similarly situated,

Plaintiff,

Case No. : 1:22-cv-00518-JLR-RWL

- against -

**AFFIDAVIT OF
LUIS FERNANDEZ**

212 STEAKHOUSE, INC., and NIKOLAY
VOLPER,

Defendants.

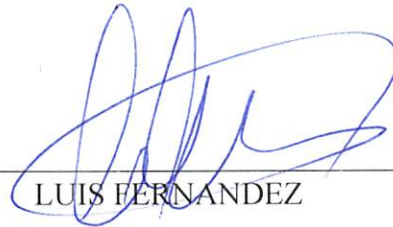
-----X
STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

I, **LUIS FERNANDEZ**, being duly sworn, deposes, and swears to affirm the truth under
penalties of perjury:

1. I, **LUIS FERNANDEZ**, am not a party to this action.
2. I currently reside at 6209 Palisades Ave. G, West New York, New Jersey. 07093
3. In or about February 2022, I began working for Defendant, 212 Steakhouse, Inc., as a server.
4. I am still currently employed by Defendant, 212 Steakhouse, Inc., as a server.
5. Throughout my tenure while working for Defendant(s), I have had no negative interactions with Defendant(s).
6. In or about May 2022, I received a text message from a phone number of “718-501-4730”, which appears to be soliciting information and/or recruiting employees regarding this lawsuit.

7. This text message advised me to call "212-688-5640". See Exhibit A.
8. Upon information and research, it appears that the text message that came from "718-501-4730" and the phone number listed in the text message "212-688-5640" are both associated with Joseph & Kirschenbaum LLC.
9. It is my position that I would not like to take part in this lawsuit against Defendants.

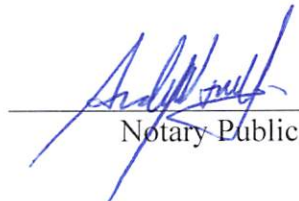
DATED: New York, New York
March 4, 2023

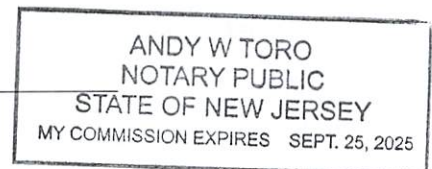


LUIS FERNANDEZ

STATE OF NEW YORK, COUNTY OF NEW YORK, ss.

On the 04 day of March 2023, before me, the undersigned notary public, personally appeared LUIS FERNANDEZ, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.



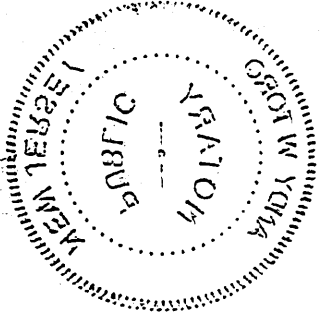
Notary Public

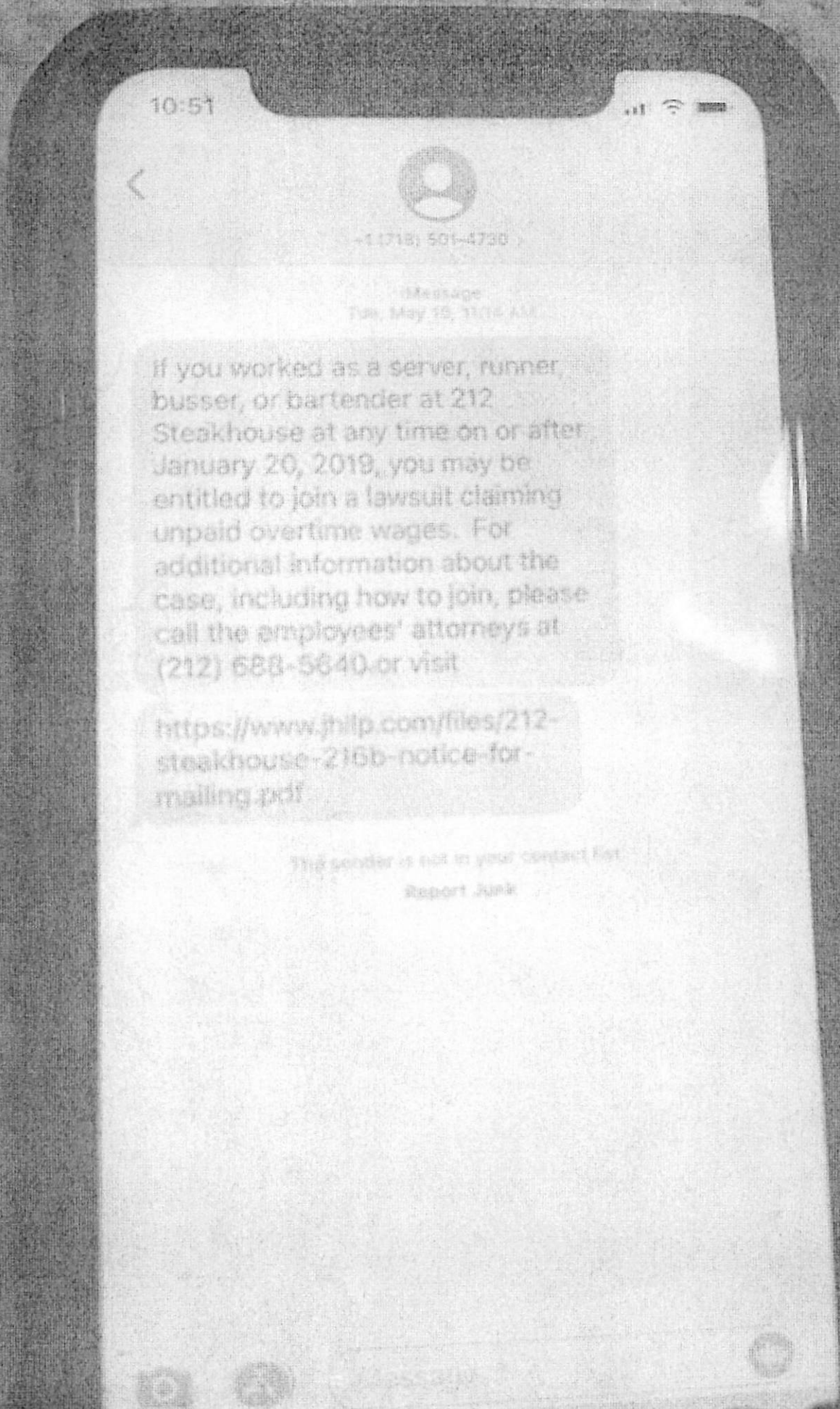
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10:51

Cellular, Wi-Fi, and Battery icons



+1 718 501-4730

iMessage

Tue, May 15, 11:16 AM

If you worked as a server, runner, busser, or bartender at 212 Steakhouse at any time on or after January 20, 2019, you may be entitled to join a lawsuit claiming unpaid overtime wages. For additional information about the case, including how to join, please call the employees' attorneys at (212) 688-5640 or visit

<https://www.jnltp.com/files/212-steakhouse-216b-notice-for-mailing.pdf>

The sender is not in your contact list.
Report Junk



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6. Throughout my tenure while working for Defendant(s), I have had no negative interactions with Defendant(s).

7. In or about May 2022, I received a text message from a phone number of “718-501-4730”, which appears to be soliciting information and/or recruiting employees regarding this lawsuit.
8. This text message advised me to call “212-688-5640”. See Exhibit A.
9. Upon information and research, it appears that the text message that came from “718-501-4730” and the phone number listed in the text message “212-688-5640” are both associated with Joseph & Kirschenbaum LLC.
10. It is my position that I would not like to take part in this lawsuit against Defendants.

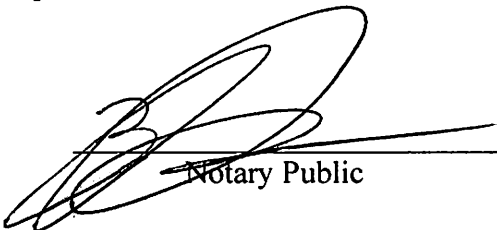
DATED: New York, New York
March 6, 2023



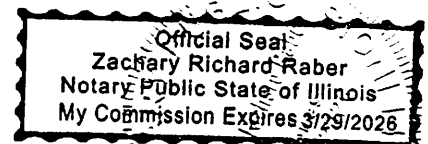
MARIKAN TAN
F

STATE OF NEW YORK, COUNTY OF NEW YORK, ss.

On the ____ day of March 2023, before me, the undersigned notary public, personally appeared MARIKAN TAN, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.



Notary Public



5-17-22

On 5/17/22, the Plaintiff's counsel, [redacted], advised that the Plaintiff's counsel had received a letter from the Defendant's counsel, [redacted], dated 5/17/22, in which the Defendant's counsel stated that the Defendant was willing to settle the matter for \$100,000.00.

The Plaintiff's counsel advised that the Plaintiff was not willing to accept the Defendant's offer of \$100,000.00.

The Plaintiff's counsel advised that the Plaintiff was willing to accept the Defendant's offer of \$100,000.00, provided that the Defendant agreed to pay the Plaintiff's reasonable attorneys' fees and costs. The Defendant's counsel advised that the Defendant was willing to agree to pay the Plaintiff's reasonable attorneys' fees and costs.

The Plaintiff's counsel advised that the Plaintiff was willing to accept the Defendant's offer of \$100,000.00, provided that the Defendant agreed to pay the Plaintiff's reasonable attorneys' fees and costs. The Defendant's counsel advised that the Defendant was willing to agree to pay the Plaintiff's reasonable attorneys' fees and costs.

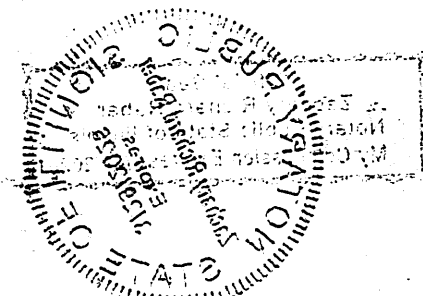
On 5/17/22, the Plaintiff's counsel, [redacted], advised that the Plaintiff's counsel had received a letter from the Defendant's counsel, [redacted], dated 5/17/22, in which the Defendant's counsel stated that the Defendant was willing to settle the matter for \$100,000.00.

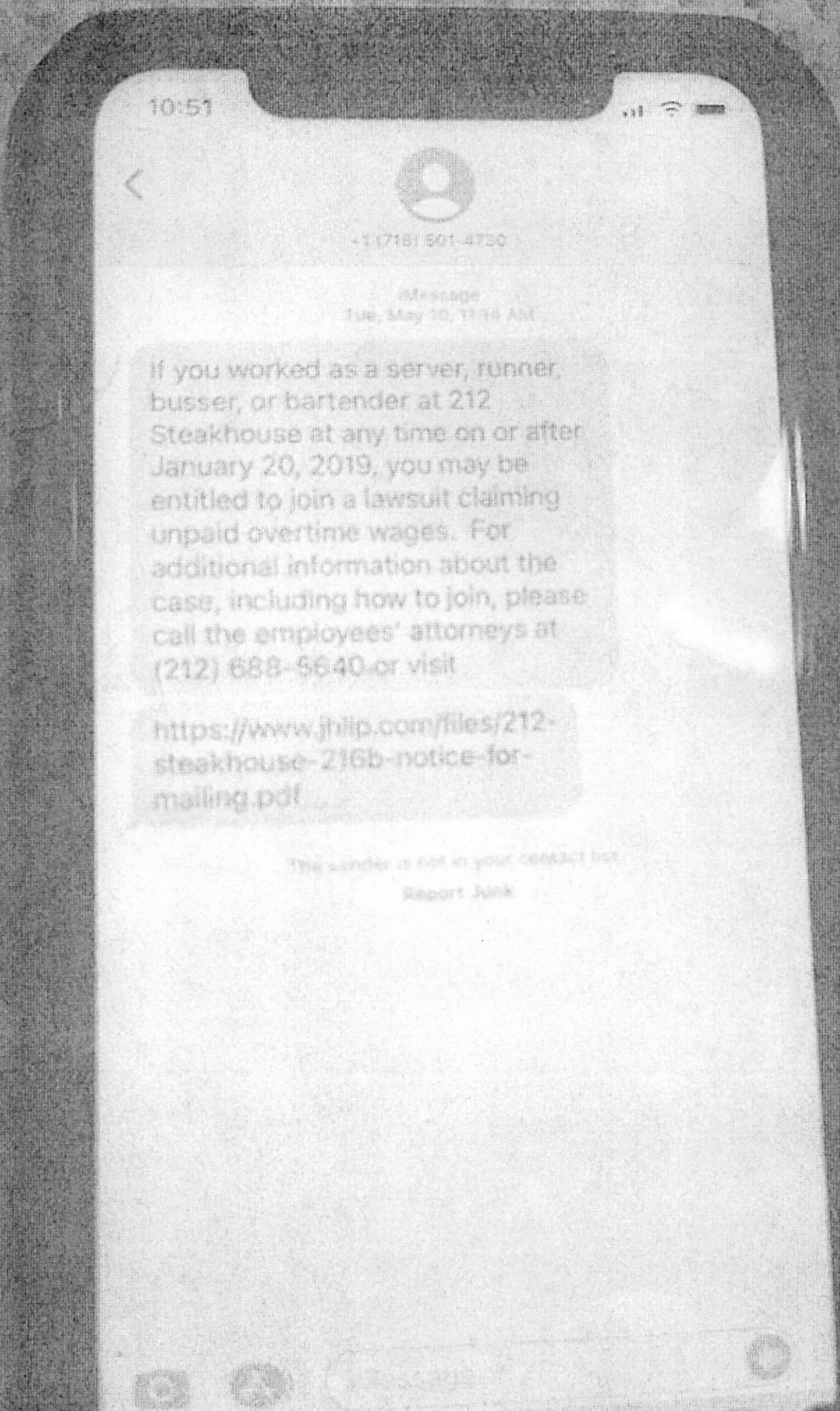
On 5/17/22, the Plaintiff's counsel, [redacted], advised that the Plaintiff's counsel had received a letter from the Defendant's counsel, [redacted], dated 5/17/22, in which the Defendant's counsel stated that the Defendant was willing to settle the matter for \$100,000.00.

On 5/17/22, the Plaintiff's counsel, [redacted], advised that the Plaintiff's counsel had received a letter from the Defendant's counsel, [redacted], dated 5/17/22, in which the Defendant's counsel stated that the Defendant was willing to settle the matter for \$100,000.00.

On 5/17/22, the Plaintiff's counsel, [redacted], advised that the Plaintiff's counsel had received a letter from the Defendant's counsel, [redacted], dated 5/17/22, in which the Defendant's counsel stated that the Defendant was willing to settle the matter for \$100,000.00. The Plaintiff's counsel advised that the Plaintiff was not willing to accept the Defendant's offer of \$100,000.00. The Plaintiff's counsel advised that the Plaintiff was willing to accept the Defendant's offer of \$100,000.00, provided that the Defendant agreed to pay the Plaintiff's reasonable attorneys' fees and costs. The Defendant's counsel advised that the Defendant was willing to agree to pay the Plaintiff's reasonable attorneys' fees and costs.

On 5/17/22, the Plaintiff's counsel, [redacted], advised that the Plaintiff's counsel had received a letter from the Defendant's counsel, [redacted], dated 5/17/22, in which the Defendant's counsel stated that the Defendant was willing to settle the matter for \$100,000.00.





UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

NINO MATINENKO, on behalf of herself and
others similarly situated,

Plaintiff,

Case No. : 1:22-cv-00518-JLR-RWL

- against -

**AFFIDAVIT OF
EVERARDO PEREZ**

212 STEAKHOUSE, INC., and NIKOLAY
VOLPER,

Defendants.

-----X

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

I, **EVERARDO PEREZ**, being duly sworn, deposes, and swears to affirm the truth
under penalties of perjury:

1. I, EVERARDO PEREZ, am not a party to this action.
2. I currently reside at 3721 59th Street, Queens, New York 11377.
3. In or about November 2019, I began working as a server for Defendant, 212 Steakhouse, Inc.
4. I currently still work as a server for Defendant, 212 Steakhouse Inc.
5. Throughout my tenure while working for Defendant(s), I have had no negative interactions with Defendant(s).
6. In or about May 2022, I received a text message from a phone number of “718-501-4730”, which appears to be soliciting information and/or recruiting employees regarding this lawsuit.

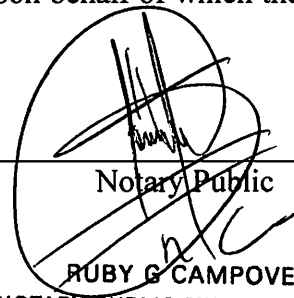
7. This text message advised me to call "212-688-5640". See Exhibit A.
8. Upon information and research, it appears that the text message that came from "718-501-4730" and the phone number listed in the text message "212-688-5640" are both associated with Joseph & Kirschenbaum LLC.
9. It is my position that I would not like to take part in this lawsuit against Defendants.

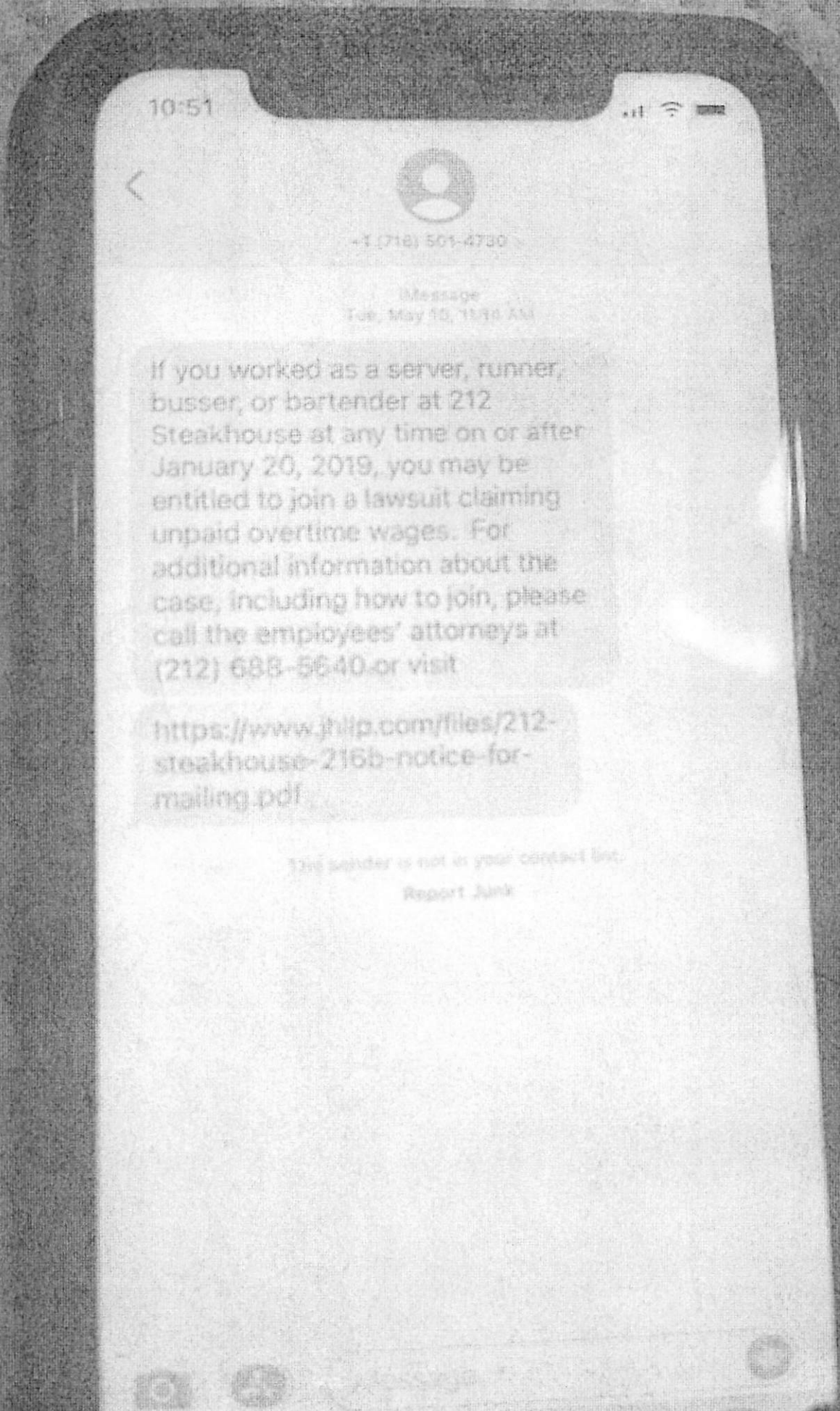
DATED: New York, New York
March 3, 2023


EVERARDO PEREZ

STATE OF NEW YORK, COUNTY OF NEW YORK, ss.

On the 3 day of March 2023, before me, the undersigned notary public, personally appeared EVERARDO PEREZ, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.


Notary Public
RUBY G CAMPOVERDE
NOTARY PUBLIC-STATE OF NEW YORK
No. 01CA6441059
Qualified in Queens County
My Commission Expires 09-19-2026



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NINO MATINENKO, on behalf of herself and
others similarly situated,

Plaintiff,

Case No. : 1:22-cv-00518-JLR-RWL

- against -

**AFFIDAVIT OF
NADIA PAPUTNIKOVA**

212 STEAKHOUSE, INC., and NIKOLAY
VOLPER,

Defendants.
-----X

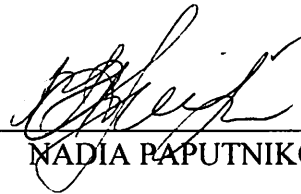
STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

I, **NADIA PAPUTNIKOVA**, being duly sworn, deposes, and swears to affirm the truth
under penalties of perjury:

1. I, **NADIA PAPUTNIKOVA**, am not a party to this action.
2. I currently reside at 2750 E 12th Street, Apt. 3C, Brooklyn, New York 11235.
3. In or about July 2016, I began my employment with Defendant, 212 Steakhouse, Inc., as a bartender.
4. In or about March 2020, I ceased my employment relationship with Defendant, 212 Steakhouse, Inc., in any and all capacities.
5. Throughout my tenure while working for Defendant(s), I have had no negative interactions with Defendant(s).

6. In or about May 2022, I received a text message from a phone number of “718-501-4730”, which appears to be soliciting information and/or recruiting employees regarding this lawsuit.
7. This text message advised me to call “212-688-5640”. See Exhibit A.
8. Upon information and research, it appears that the text message that came from “718-501-4730” and the phone number listed in the text message “212-688-5640” are both associated with Joseph & Kirschenbaum LLC.
9. It is my position that I would not like to take part in this lawsuit against Defendants.

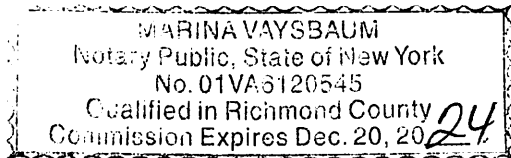
DATED: New York, New York
March 6th, 2023



NADIA PAPUTNIKOVA

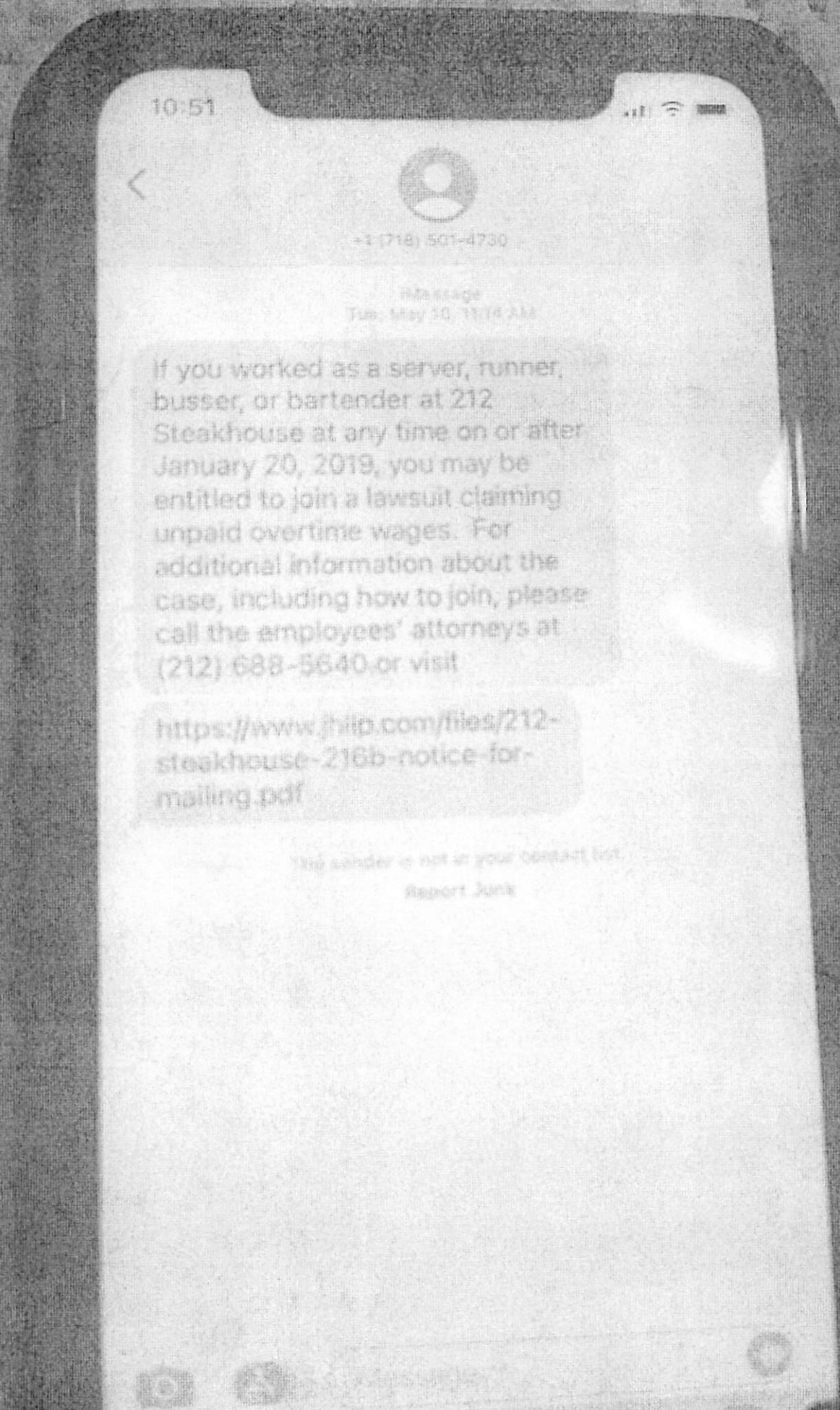
STATE OF NEW YORK, COUNTY OF NEW YORK, ss.

On the 6th day of March 2023, before me, the undersigned notary public, personally appeared NADIA PAPUTNIKOVA, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her capacity, and that by her signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.





Notary Public



If you worked as a server, runner, busser, or bartender at 212 Steakhouse at any time on or after January 20, 2019, you may be entitled to join a lawsuit claiming unpaid overtime wages. For additional information about the case, including how to join, please call the employees' attorneys at (212) 688-5640 or visit

<https://www.jhilp.com/files/212-steakhouse-216b-notice-for-mailing.pdf>

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NINO MATINENKO, on behalf of herself and
others similarly situated,

Plaintiff,

Case No. : 1:22-cv-00518-JLR-RWL

- against -

**AFFIDAVIT OF
SAMUEL GARCIA**

212 STEAKHOUSE, INC., and NIKOLAY
VOLPER,

Defendants.

-----X
STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

I, **SAMUEL GARCIA**, being duly sworn, deposes, and swears to affirm the truth under
penalties of perjury:

1. I, **SAMUEL GARCIA**, am not a party to this action.
2. I currently reside at 703 E. 137th Street, Apt. 4B, Bronx, New York 10454.
3. In or about June 2018, I began working for Defendant, 212 Steakhouse, Inc., as a runner.
4. I am still currently employed by Defendant, 212 Steakhouse, Inc., as a runner.
5. Throughout my tenure while working for Defendant(s), I have had no negative interactions with Defendant(s).
6. In or about May 2022, I received a text message from a phone number of “718-501-4730”, which appears to be soliciting information and/or recruiting employees regarding this lawsuit.

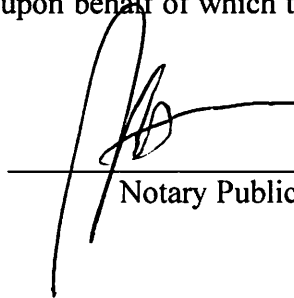
7. This text message advised me to call "212-688-5640". See Exhibit A.
8. Upon information and research, it appears that the text message that came from "718-501-4730" and the phone number listed in the text message "212-688-5640" are both associated with Joseph & Kirschenbaum LLC.
9. It is my position that I would not like to take part in this lawsuit against Defendants.

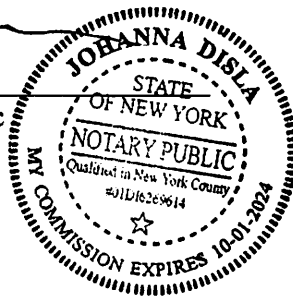
DATED: New York, New York
March 3, 2023

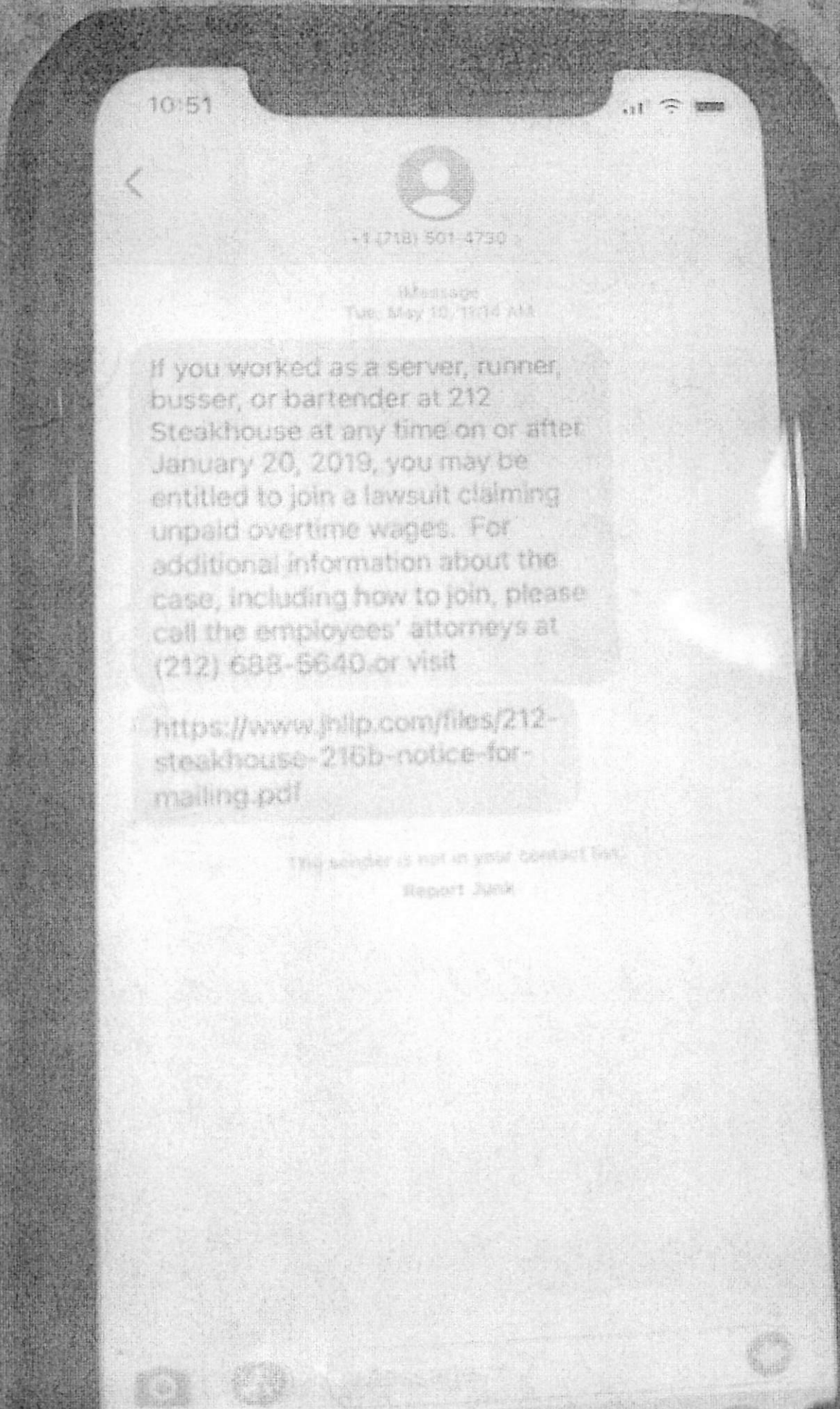

SAMUEL GARCIA

STATE OF NEW YORK, COUNTY OF NEW YORK, ss.

On the 3 day of March, 2023, before me, the undersigned notary public, personally appeared SAMUEL GARCIA, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.


Notary Public





10:51



+1 (718) 501-4730

iMessage
Tue, May 10, 11:34 AM

If you worked as a server, runner, busser, or bartender at 212 Steakhouse at any time on or after January 20, 2019, you may be entitled to join a lawsuit claiming unpaid overtime wages. For additional information about the case, including how to join, please call the employees' attorneys at (212) 688-5640 or visit

<https://www.jhlp.com/files/212-steakhouse-216b-notice-for-mailing.pdf>

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NINO MATINENKO, on behalf of herself and
others similarly situated,

Plaintiff,

Case No. : 1:22-cv-00518-JLR-RWL

- against -

**AFFIDAVIT OF
OSCAR MORALES**

212 STEAKHOUSE, INC., and NIKOLAY
VOLPER,

Defendants.

-----X

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

I, **OSCAR MORALES**, being duly sworn, deposes, and swears to affirm the truth under
penalties of perjury:

1. I, OSCAR MORALES, am not a party to this action.
2. I currently reside at 5501 98th Street, Apt. 1, Corona, New York 11368.
3. In or about March 2022, I began working for Defendant, 212 Steakhouse, Inc., as a
server.
4. I am currently still employed by Defendant, 212 Steakhouse, Inc., as a server.
5. Throughout my tenure while working for Defendant(s), I have had no negative
interactions with Defendant(s).
6. In or about May 2022, I received a text message from a phone number of “718-501-
4730”, which appears to be soliciting information and/or recruiting employees regarding
this lawsuit.

7. This text message advised me to call "212-688-5640". See Exhibit A.
8. Upon information and research, it appears that the text message that came from "718-501-4730" and the phone number listed in the text message "212-688-5640" are both associated with Joseph & Kirschenbaum LLC.
9. It is my position that I would not like to take part in this lawsuit against Defendants.

DATED: New York, New York
March __, 2023



OSCAR MORALES

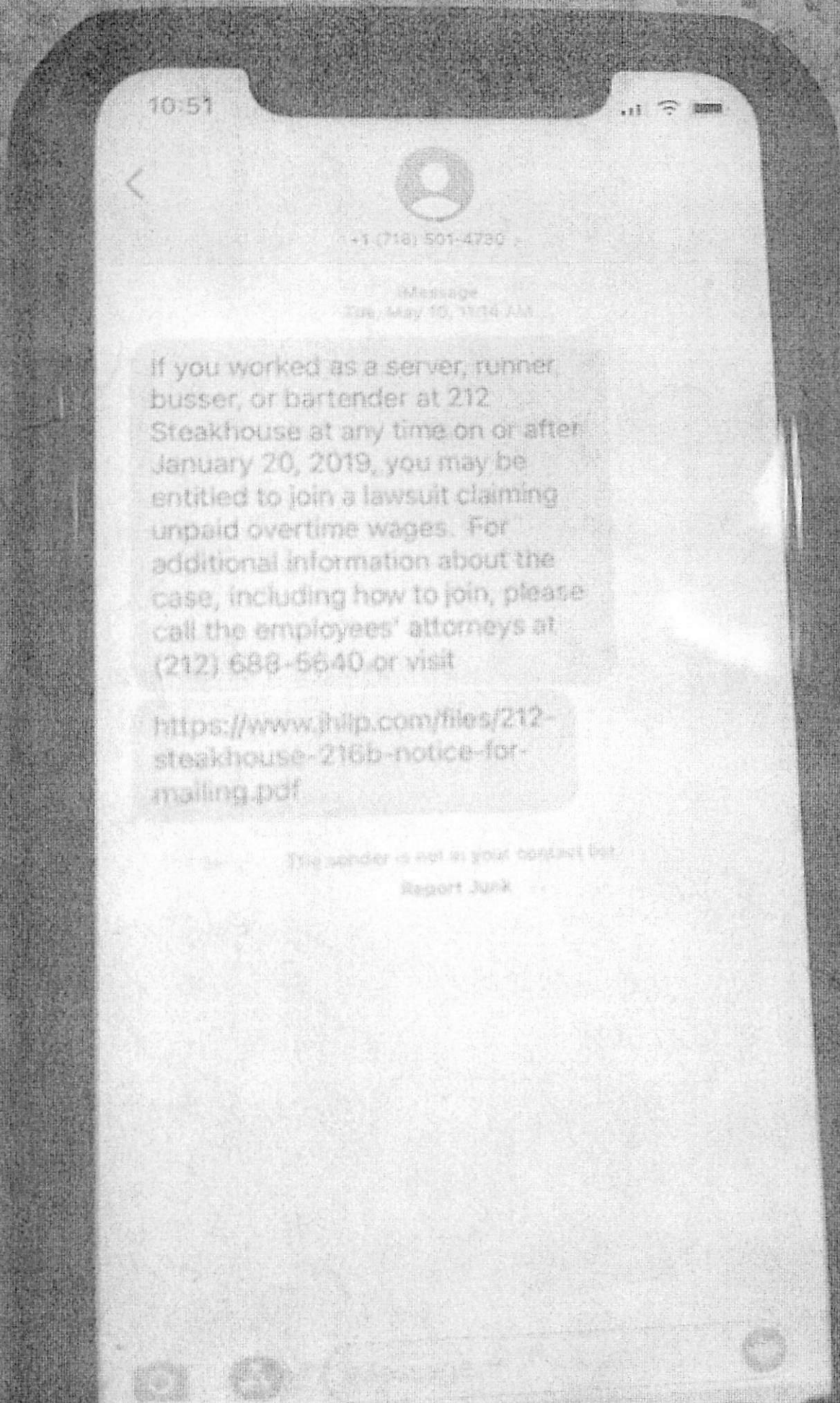
STATE OF NEW YORK, COUNTY OF NEW YORK, ss.

On the __ day of March, 2023, before me, the undersigned notary public, personally appeared OSCAR MORALES, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.



Notary Public

GELEEN YADIRA RIOS
NOTARY PUBLIC, STATE OF NEW YORK
NO. 01R16410897
QUALIFIED IN QUEENS COUNTY
MY COMMISSION EXPIRES NOV 2, 2023



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

NINO MATINENKO, on behalf of herself and
others similarly situated,

Plaintiff,

Case No. : 1:22-cv-00518-JLR-RWL

- against -

**AFFIDAVIT OF
ALEXANDER PORRAS**

212 STEAKHOUSE, INC., and NIKOLAY
VOLPER,

Defendants.

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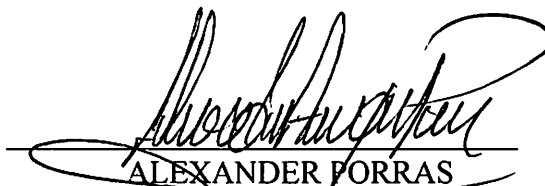
STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

I, **ALEXANDER PORRAS**, being duly sworn, deposes, and swears to affirm the truth
under penalties of perjury:

1. I, **ALEXANDER PORRAS**, am not a party to this action.
2. I currently reside at _____.
3. On or about _____, I began working for Defendant, 212 Steakhouse, Inc., as a
_____.
4. On or about _____, I ceased working for Defendant, 212 Steakhouse, Inc.,
completely.
5. Throughout my tenure while working for Defendant(s), I have had no negative
interactions with Defendant(s).

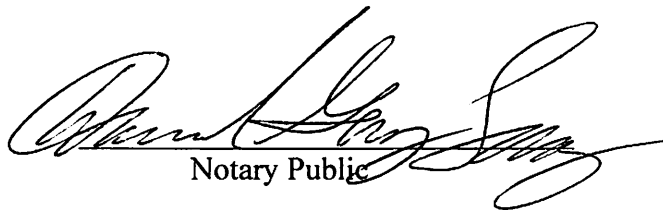
6. In or about May 2022, I received a text message from a phone number of “718-501-4730”, which appears to be soliciting information and/or recruiting employees regarding this lawsuit.
7. This text message advised me to call “212-688-5640”. See Exhibit A.
8. Upon information and research, it appears that the text message that came from “718-501-4730” and the phone number listed in the text message “212-688-5640” are both associated with Joseph & Kirschenbaum LLC.
9. It is my position that I would not like to take part in this lawsuit against Defendants.

DATED: New York, New York
March __, 2023


ALEXANDER PORRAS

STATE OF NEW YORK, COUNTY OF NEW YORK, ss.

On the __ day of March, 2023, before me, the undersigned notary public, personally appeared ALEXANDER PORRAS, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.


Notary Public

DANIEL GUY LONG
NOTARY PUBLIC-STATE OF NEW YORK
No. 01LOG425444
Qualified in Westchester County
My Commission Expires 11-22-2025

81-10

1. The Court has previously found that the Defendant's conduct was a violation of the law.

2. The Court has previously found that the Defendant's conduct was a violation of the law.

Continued

3. The Court has previously found that the Defendant's conduct was a violation of the law.

4. The Court has previously found that the Defendant's conduct was a violation of the law.

5. The Court has previously found that the Defendant's conduct was a violation of the law.

6. The Court has previously found that the Defendant's conduct was a violation of the law.

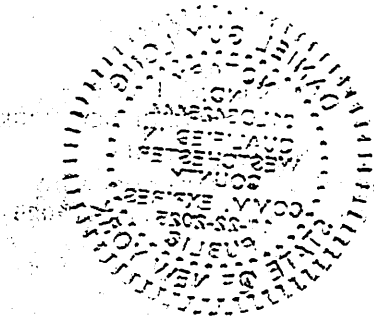
7. The Court has previously found that the Defendant's conduct was a violation of the law.

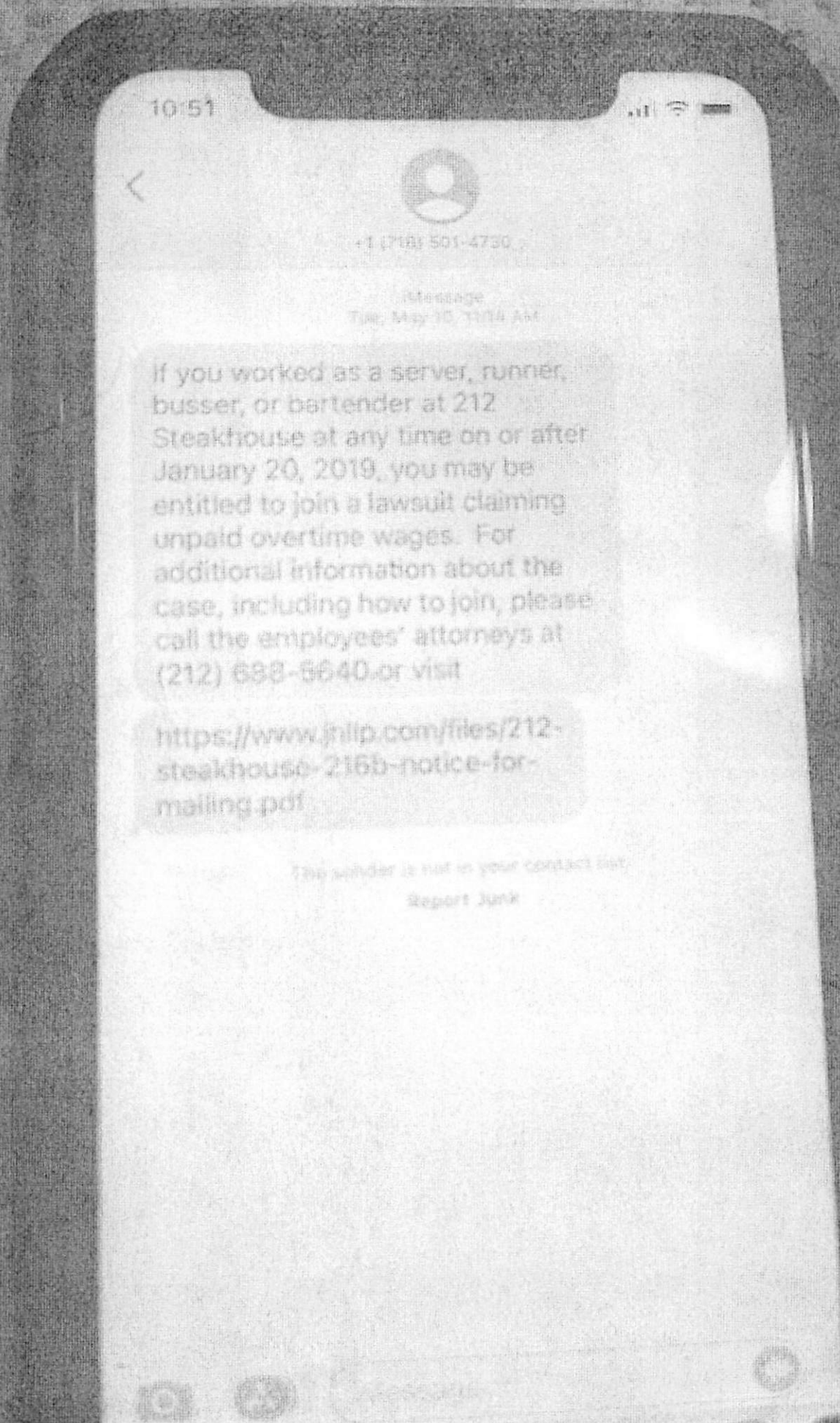
8. The Court has previously found that the Defendant's conduct was a violation of the law.

9. The Court has previously found that the Defendant's conduct was a violation of the law.

10. The Court has previously found that the Defendant's conduct was a violation of the law.

11. The Court has previously found that the Defendant's conduct was a violation of the law.





If you worked as a server, runner, busser, or bartender at 212 Steakhouse at any time on or after January 20, 2019, you may be entitled to join a lawsuit claiming unpaid overtime wages. For additional information about the case, including how to join, please call the employees' attorneys at (212) 688-6640 or visit

<https://www.jnlip.com/files/212-steakhouse-216b-notice-for-mailing.pdf>

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